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# Exhibit 3

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**From:** Saint-Fort, Dominique (Law) <[dosaint@law.nyc.gov](mailto:dosaint@law.nyc.gov)>  
**Sent:** Tuesday, August 4, 2020 9:07 AM  
**To:** Coles, Anthony P. <[anthony.coles@us.dlapiper.com](mailto:anthony.coles@us.dlapiper.com)>  
**Cc:** Saleski, Courtney <[Courtney.Saleski@us.dlapiper.com](mailto:Courtney.Saleski@us.dlapiper.com)>; Quinn, Rebecca Jo (Law) <[rquinn@law.nyc.gov](mailto:rquinn@law.nyc.gov)>  
**Subject:** UFOA et al. v. de Blasio, et al.

[EXTERNAL]

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Tony,

Allow this email to confirm that Defendants do not agree to enter into the stipulation Plaintiffs proposed in their July 31, 2020 letter to the Court, annexed as Exhibit A. See ECF Dkt. No. 63.

With discovery closing at the end of the week, the 30(b)(6) depositions must be scheduled as soon as possible. Defendants have identified the following witnesses:

- NYPD- Lesa Moore, Agency Attorney, FOIL Litigation Supervisor
- CCRB- Kerry Jamieson, Assistant General Counsel, Agency Privacy Officer and Records Access Appeals Officer
- DOC- Laura Mello, Senior Counsel, FOIL Officer
- FDNY- Sheryl E. Montour, Records Access Officer

All of the witnesses identified above are fairly flexible for the remainder of the week. Lesa Moore, however, is only available after noon on Wednesday and Thursday, but is otherwise available.

Please provide us with Plaintiffs availability so that we can schedule the depositions by the end of the day.

Best,

**Dominique F. Saint-Fort**  
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Labor and Employment Law Division  
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